REMARKS

Claims 1-48 were considered in the Office Action dated April 24, 2007. The Office Action withdraws previous rejections but presents new rejections in light of combinations of previously-cited art with newly-cited reference, Staiger et al., "Tutorial – Getting started with Amapi 4.1," Revised July 9, 2003, TGS, Inc., http://www.tgs.com, accessed on 4/17/2007 via http://www.thebest3d.com/amapi/tutorials/bottlesmile/index.html (**Staiger II**) (Applicant does not acquiesce that this constitutes prior art).

Claims 1-11, 30-40 and 42-48 stand as rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Staiger, Phillip, "Tutorial – Amapi 4.1.5 Material Editor," Revised January 1, 2001, TGS, Inc., http://www.tgs.com, accessed on 9/8/2006 via http://www.thebest3d.com/amapi/tutorials/materialeditor/) (**Staiger I**), in view of **Staiger II**.

Claims 12-16, 18, and 20-22 stand as rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over **Staiger I** in view of **Staiger II** and further in view of U.S. Patent No. 5,461,709 (**Brown**).

Claims 17 and 19 stand as rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over **Staiger I** in view of **Staiger II** and further in view of **Brown** and further in view of U.S. Patent No. 6,822,635 B2 (**Shahoian**).

Claims 23-28 and 41 stand as rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over **Staiger I** in view of **Staiger II** and further in view of U.S. Patent No. 5,371,778 (**Yanof**).

Claim 29 stands as rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over **Staiger I** in view of **Staiger II** and further in view of **Yanof** and further in view of **Brown**.

Without acquiescing to any of the arguments or rejections of the Office Action, the Applicant amends independent claims 1, 10, 23, and 30, as reflected in the Listing of Claims. The amendments are supported in the specification as originally filed, for example, on page 4, lines 12-14; on page 9, lines 12-13; on page 26, lines 20-22; on page 43, lines 14-16; and in Figures 21A-C, 23A-C, and 26A-C. No new matter is added.

Applicant also cancels dependent claims 43-44 without prejudice.

Upon entry of this paper, claims 1-42 and 45-48 will be pending.

The fact that the 3D GUI element is operable to selectively adjust only texture within the user-defined region clearly distinguishes the invention from the cited art.

Each of the independent claims has been amended to indicate that the three-dimensional graphical user interface element is operable to adjust the mapped texture within the arbitrarily shaped user-defined region of the surface without affecting a contiguous portion of said surface outside said user-defined region. The independent claims have also been amended to indicate that

the user-defined region is less than the entire surface of the three-dimensional virtual object. None of the cited art, alone or in combination, teaches or suggests a 3D GUI with these attributes.

For example, Figures 21A-C, 23A-C, and 26A-C, reproduced below, demonstrate the 3D GUI of the instant application, operable to adjust an arbitrarily-shaped user-defined region of the surface of a 3D virtual object without affecting the rest of the surface outside the region. Figures 21A-C demonstrate translating the texture within the arbitrarily-shaped user-defined region using the 3D GUI; Figures 23A-C demonstrate scaling the texture within the arbitrarily-shaped user-defined region using the 3D GUI, and Figures 26A-C demonstrate rotating the texture within the arbitrarily-shaped user-defined region using the 3D GUI.

Translating

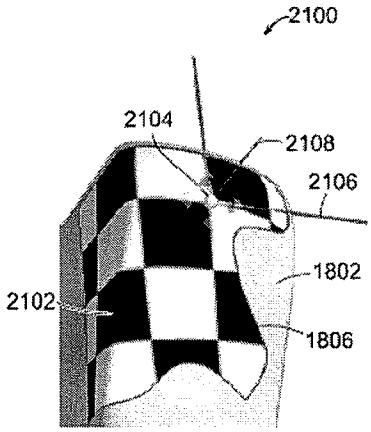


FIG. 21A

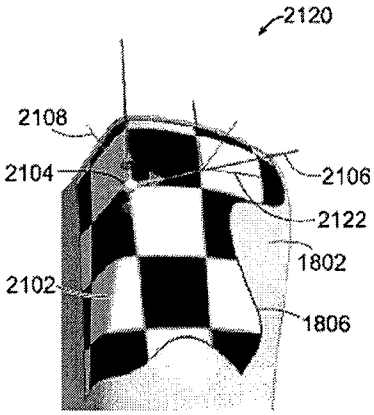


FIG. 21B

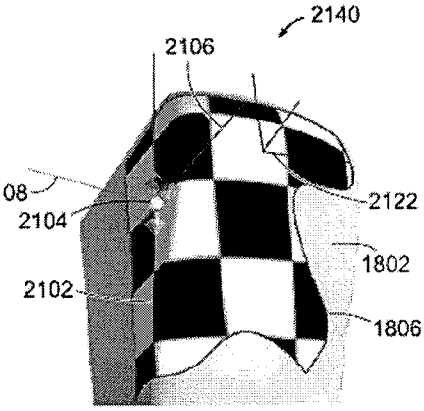


FIG. 21C

Scaling

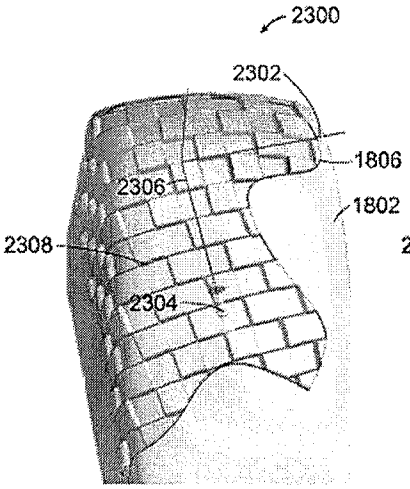


FIG. 23A

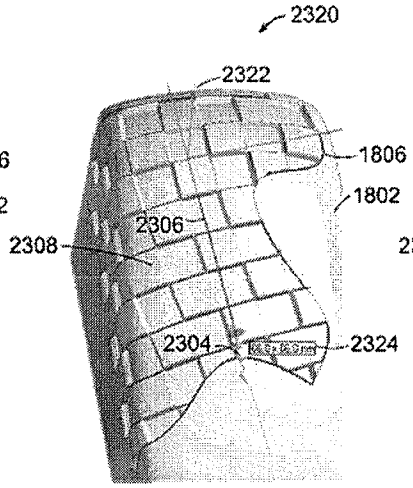


FIG. 23B

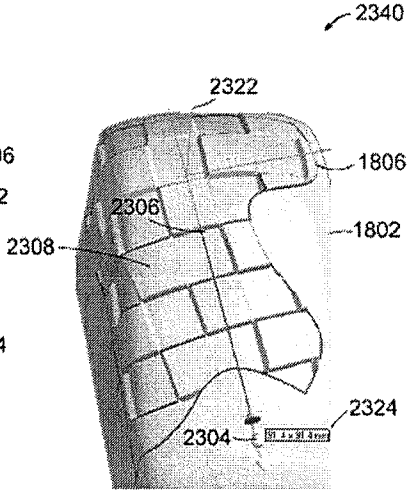


FIG. 23C

Rotating

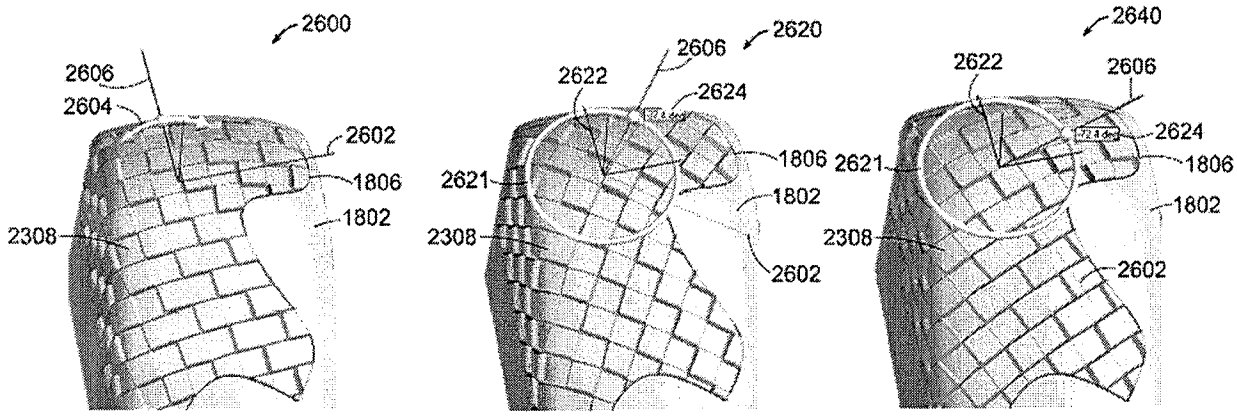
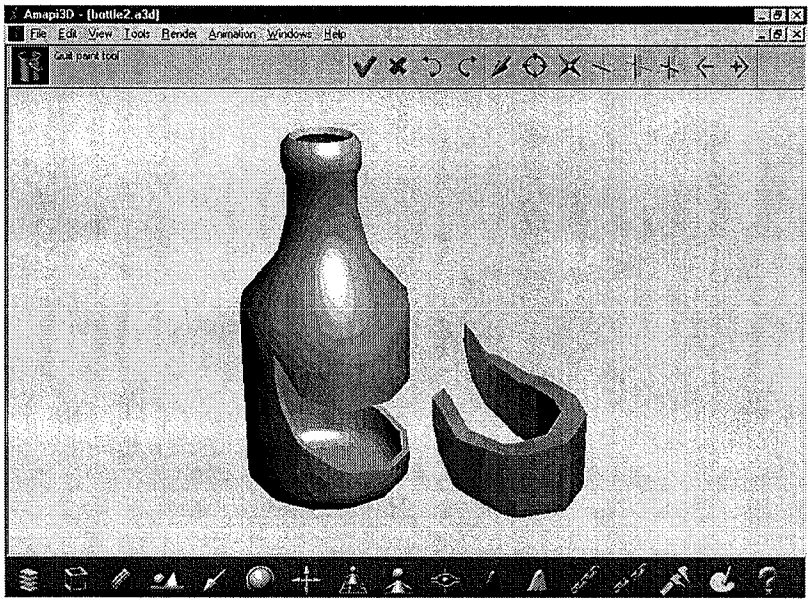


FIG. 26A FIG. 26B FIG. 26C

Independent claims 1, 10, 23, and 30 (and their dependent claims) distinguish over **Staiger I** and **Staiger II**

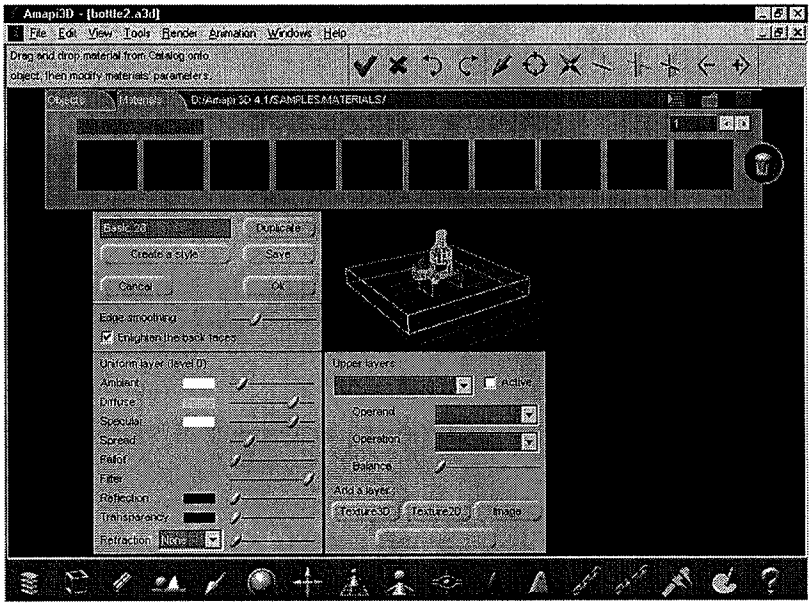
Neither **Staiger I** nor **Staiger II** teaches or suggests a three-dimensional graphical user interface element operable to adjust mapped texture within an arbitrarily shaped user-defined region of the surface of a 3D virtual object without affecting a contiguous portion of said surface outside the user-defined region.

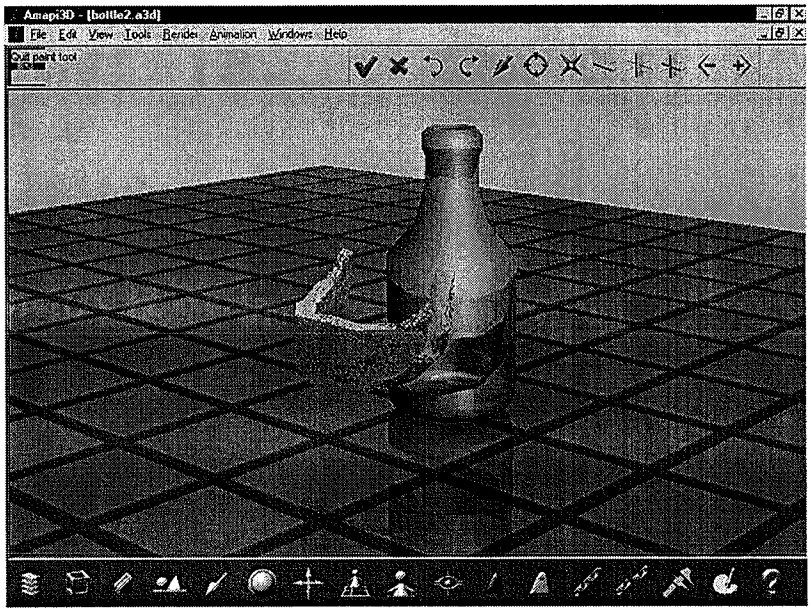
The Office Action states, "**Staiger** [I] does not explicitly disclose texture mapped onto an arbitrarily-shaped, user-defined region of a 3D virtual object." However, the Office Action alleges that **Staiger II** "explicitly discloses applying 2D or 3D texture to the bottle and an extracted piece, from the bottle object (pgs. 49-52 and especially pg. 51, paragraphs 3-5 and Figure on pg. 52)". The drawing on page 51 of **Staiger II** is reproduced below:



Applicant contends that **Staiger II** does not teach use of a 3D GUI element to adjust mapped texture without affecting a contiguous portion of said surface outside an arbitrarily-shaped user-defined region.

For example, there is no "contiguous portion" of the surface outside an arbitrarily-shaped user-defined region in **Staiger II**. The broken piece of the bottle in **Staiger II** is separate from the rest of the bottle and is a distinct virtual object. Texture appears to be applied to the entire surface of the broken piece – there is no contiguous portion of the surface of the broken piece outside a user-defined region. Furthermore, **Staiger II** does not use a three-dimensional GUI to adjust mapped texture. Instead, there appears to be a drop-down menu, as shown on pages 50 and 52 of **Staiger II**, reproduced below:





Moreover, with respect to dependent claims 2-4, **Staiger II** does not translate, rotate, or scale texture within an arbitrarily-shaped user-defined region.

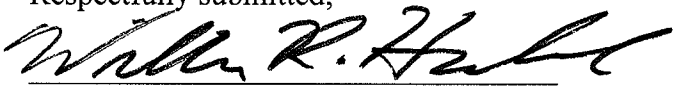
None of the other cited art (**Staiger I**, **Brown**, **Shahoian**, and **Yanof**), individually or in combination, teaches or suggests a three-dimensional graphical user interface element operable to adjust mapped texture within an arbitrarily shaped user-defined region of the surface of a 3D virtual object without affecting a contiguous portion of said surface outside the user-defined region, as recited in claims 1, 10, 23, and 30.

Thus, claims 1, 10, 23, and 30 are patentable in light of all the cited art, at least for the reasons presented here, and Applicant respectfully requests reconsideration and withdrawal of the rejections of these claims. Dependent claims 2-9, 11-22, 24-29, 31-42, and 45-48 depend directly or indirectly from one of these independent claims and are therefore also patentable in light of all the cited art, at least on this basis. Applicant respectfully requests reconsideration and withdrawal of the rejections of these claims as well.

CONCLUSION

In view of the foregoing, Applicant respectfully requests reconsideration and withdrawal of all rejections, and allowance of claims 1-42 and 45-48 in due course. The Examiner is hereby cordially invited to contact Applicant's undersigned representative by telephone at the number listed below to discuss any outstanding issues.

Respectfully submitted,



Date: July 23, 2007
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